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Attorneys for Defendant
CITY AND COUNTY OF SAN FRANCISCO

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

HASTINGS COLLEGE OF THE LAW, a
public trust and institution of higher education
duly organized under the laws and the
Constitution of the State of California;
FALLON VICTORIA, an individual; RENE
DENIS, an individual; TENDERLOIN
MERCHANTS AND PROPERTY
ASSOCIATION, a business association;
RANDY HUGHES, an individual; and
KRISTEN VILLALOBOS, an individual,

Plaintiffs,

vs.

CITY AND COUNTY OF SAN
FRANCISCO, a municipal entity,

Defendant.

Case No. 4:20-cv-3033-JST

**DECLARATION OF RENEE E. ROSENBLIT
IN SUPPORT OF ADMINISTRATIVE
MOTION TO RELATE CASES**

Trial Date: Not Set

1 I, Renée E. Rosenblit, declare as follows:

2 1. I am a Deputy City Attorney for the City and County of San Francisco. The facts set
3 forth in this declaration are stated on my own personal knowledge or, as specified, upon my
4 information and belief based on official acts and writings.

5 2. Attached to this declaration as Exhibit A is a copy of the complaint *Patrina Harrison v.*
6 *City and County of San Francisco*, 20-cv-05178 WHA, ("*Harrison*"), filed on July 23, 2020.

7 3. Deputy City Attorney Ryan Stevens emailed Matthew Davis, counsel for the Plaintiffs
8 in the *Hastings* action, to ask whether Plaintiffs in that action would oppose relation of either action.
9 Mr. Davis responded that Plaintiffs took no position on the motion to relate.

10 4. DCA Stevens emailed counsel for the interveners in the *Hastings* action to ask whether
11 Intervenor would oppose this motion to relate. Counsel for Intervenor, Lauren Hansen, responded
12 that they did not oppose the filing of this motion.

13 5. On August 10, 2020, I called pro per plaintiff Patrina Harrison, in the *Harrison* action,
14 to ask whether she would oppose relation. She stated that she did not oppose the filing of the motion,
15 but she likely opposes relation of the cases. I informed her that I would send her the motion prior to
16 filing.

17 6. On August 21, 2020, I emailed Ms. Harrison a copy of this administrative motion to
18 relate and asked whether she opposed the motion. As of the filing of this motion, I have not received a
19 response to that email.

20 I declare under penalty of perjury under the laws of the State of California that the foregoing is
21 true and correct. Executed on August 24, 2020 at Oakland, California.

22
23 /s/ Renee E. Rosenblit
24 RENÉE E. ROSENBLIT
25
26
27
28

PROOF OF SERVICE

I, ANNAMARIE DAVIS, declare as follows:

I am a citizen of the United States, over the age of eighteen years and not a party to the above-entitled action. I am employed at the City Attorney's Office of San Francisco, Fox Plaza Building, 1390 Market Street, Sixth Floor, San Francisco, CA 94102.

On August 24, 2020, I served the following document(s):

DECLARATION OF RENEE E. ROSENBLIT IN SUPPORT OF ADMINISTRATIVE MOTION TO RELATE CASES

on the following persons at the locations specified:

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in the manner indicated below:

☒ **BY UNITED STATES MAIL:** Following ordinary business practices, I sealed true and correct copies of the above documents in addressed envelope(s) and placed them at my workplace for collection and mailing with the United States Postal Service. I am readily familiar with the practices of the San Francisco City Attorney's Office for collecting and processing mail. In the ordinary course of business, the sealed envelope(s) that I placed for collection would be deposited, postage prepaid, with the United States Postal Service that same day.

I declare under penalty of perjury pursuant to the laws of the State of California that the foregoing is true and correct.

Executed August 24, 2020, at San Francisco, California.



ANNAMARIE DAVIS